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LISA D. NORDSTROM
Lead Counsel
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July 24, 2013

VIA HAND DELIVERY

Jean D. Jewell, Secretary
Idaho Public Utilities Commission
472 West Washington Street
Boise, Idaho 83702

Re: Case No. IPC-E-12-27
Net Metering Service – Idaho Power Company's Petition for Clarification
and/or Reconsideration of Order No. 32846

Dear Ms. Jewell:

Enclosed for filing in the above matter are an original and seven (7) copies of Idaho Power Company's Petition for Clarification and/or Reconsideration of Order No. 32846.

Very truly yours,



Lisa D. Nordstrom

LDN:csb
Enclosures

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Attorneys for Idaho Power Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)	
COMPANY'S APPLICATION FOR)	CASE NO. IPC-E-12-27
AUTHORITY TO MODIFY ITS NET)	
METERING SERVICE AND TO)	IDAHO POWER COMPANY'S
INCREASE THE GENERATION)	PETITION FOR CLARIFICATION
CAPACITY LIMIT)	AND/OR RECONSIDERATION OF
)	ORDER NO. 32846
)	

Idaho Power Company ("Idaho Power" or "Company"), petitioner herein, pursuant to RP 33, 325, and 331, *et seq.*, and *Idaho Code* § 61-626, respectfully petitions the Idaho Public Utilities Commission ("Commission") for clarification and/or reconsideration of final Order No. 32846, dated July 3, 2013, issued in Case No. IPC-E-12-27. Idaho Power seeks clarification regarding the effective date of excess energy billing changes for net metering service under Schedule 84. To the extent that the Commission feels the requested clarification goes beyond the scope of a clarification, then Idaho Power respectfully requests reconsideration of the issues identified herein. See RP 325.

I. BACKGROUND

1. On November 30, 2012, Idaho Power filed its Application with the Commission requesting authority to modify its net metering service. The Company sought to: (1) increase the net metering service capacity limit from 2.9 megawatts to 5.8 megawatts, (2) change the net metering service pricing structure for residential and small general service customers, (3) change how the Company bills excess net energy under Schedule 84, Customer Energy Production Net Metering, and (4) address a variety of interconnection issues in Schedule 72, Interconnections to Non-Utility Generation.

2. On January 15, 2013, the Commission issued a Notice of Application and Notice of Intervention. Order No. 32715. The Idaho Conservation League; PowerWorks LLC; Pioneer Power, LLC; City of Boise; Snake River Alliance; and Idaho Clean Energy Association, Inc., intervened in the case. A prehearing conference was held on March 21, 2013. The Commission then issued an order setting a case schedule, including public workshops. Order No. 32767. Technical and public hearings took place on June 11, 2013, as scheduled by Order No. 32794.

3. On July 3, 2013, the Commission issued Order No. 32846 approving and denying portions of the Company's request. Effective October 1, 2013, the Commission directed Idaho Power to compensate net excess generation with a kilowatt-hour ("kWh") credit that shall carryover to offset the customer's electricity usage without expiration until the customer is no longer a customer at the site of the net metering generation system. Order No. 32846, pp. 15 and 19.

II. EXCESS NET ENERGY EFFECTIVE DATE

4. In its Application and supporting testimony, Idaho Power requested authorization to provide customers with a kWh credit in the amount of excess net

energy accrued during a billing period that could be carried forward and applied against usage in subsequent billing periods. The Company requested that this change be implemented at the beginning of each customer's January 2014 billing period. Application at pp. 2, 8, and 11.

5. On pages 15 and 19 of Order No. 32846, the Commission approved the Company's request to compensate net excess generation with a kWh credit instead of a financial credit but ordered that the credits carryover to offset the customer's electricity usage without expiration until the customer is no longer a customer at the site of the net metering generation system. On page 19, the Commission ordered: "This change to how excess energy is billed will apply to customers effective October 1, 2013. The Company shall file for our approval a Schedule 84 that conforms to the requirements of this Order."

6. Idaho Power does not request reconsideration of the substantive excess generation billing decision; it merely requests that the Commission allow the Company to implement the kWh billing and carryover provisions approved for net metering customers beginning with each customer's January 2014 billing period as Idaho Power originally proposed in its Application, instead of the October 1, 2013, effective date identified in Order No. 32846. Idaho Power is in the process of transitioning to a new customer relationship and billing system, which is currently expected to become operational in September 2013. Implementing the ordered modifications to the billing of excess generation at the beginning of each net metering customer's January 2014 billing period will allow a few months of operational experience with the new billing system prior to modifying the system's billing and kWh tracking logic. A successful transition to the new billing system will require Company support staff and the third-party system integrator to be completely dedicated to the system implementation

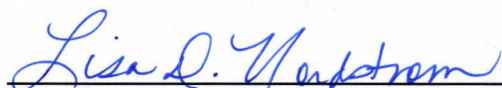
process and the subsequent system stabilization efforts once the new system becomes operational. With these personnel constraints in mind, Idaho Power believes that performing the system modifications necessary to facilitate the kWh crediting provision for net metering customers by the October 1, 2013, effective date would put at risk the Company's ability to successfully transition to the new billing system.

7. Commission Rule of Procedure 331 requires that Idaho Power state the nature and extent of evidence or argument it will present or offer if reconsideration is granted. Should the Commission determine that either of the requested issues for clarification is more appropriate for reconsideration, Idaho Power believes that the evidentiary record could be augmented by written comments or oral argument at the discretion of the Commission, and the Company is prepared to do so in support of its need for an additional three months to implement the Commission's directive.

III. CONCLUSION

8. Idaho Power respectfully requests the Commission clarify and/or reconsider Order No. 32846 to authorize Idaho Power to implement excess energy billing changes for net metering service under Schedule 84 effective with each net metering customer's January 2014 billing period.

Respectfully submitted this 24th day of July 2013.



LISA D. NORDSTROM

Attorney for Idaho Power Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 24th day of July 2013 I served a true and correct copy of IDAHO POWER COMPANY'S PETITION FOR CLARIFICATION AND/OR RECONSIDERATION OF ORDER NO. 32846 upon the following named parties by the method indicated below, and addressed to the following:

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